



EPSTEIN DRANGEL LLP

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July 5, 2023

**VIA ECF**

Hon. John P. Cronan  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *Spin Master Ltd., et al. v. chakaruna4169, et al.***  
**Civil Case No. 22-cv-553**  
**Second Letter Request for Extension of Deadline to File Supplemental Brief**

Dear Judge Cronan,

We represent Plaintiffs Spin Master Ltd. and Spin Master Toys UK Limited (“Plaintiffs”) in the above-referenced matter (the “Action”).<sup>1</sup> On June 1, 2023, the Court entered an Order, *inter alia*, directing Plaintiffs file an amended supplemental brief by July 1, 2023 (“Supplemental Brief”). (Dkt. 56). For the reasons set forth herein, Plaintiffs respectfully request a second short extension of time to file their Supplemental Brief, until July 12, 2023. In accordance with Your Honor’s Individual Rules of Practice, Plaintiffs respectfully submit the following:

1. **The original date(s) set for the appearance or deadline(s) and the new date(s) requested:**  
The original deadline for Plaintiffs to file the Supplemental Brief is July 1, 2023, which the Court extended to July 7, 2023 (Dkt. 59), Plaintiffs now respectfully request to file the Supplemental Brief by July 12, 2023;
2. **The reason(s) for the request:** Plaintiffs respectfully request additional time as Epstein Drangel is exhausting its efforts to verify the accuracy of Defendants’ addresses. Specifically, to date, Epstein Drangel has (1) conducted its own investigation to attempt to determine the accuracy of Defendants’ addresses, which was unsuccessful; (2) requested that Epstein Drangel’s Beijing office attempt to determine the accuracy of Defendants’ addresses, but they were unable to do so; and (3) hired a law firm in Sri Lanka who is in the process of researching Defendants’ addresses and has indicated yesterday, July 4, 2023, that they would provide the results of their investigation by the end of business on Friday July 7, 2023. Accordingly, Plaintiffs request a short extension of time to review the results provided by the Sri Lankan law firm and provide the responsive information to the Court.

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<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiffs’ Complaint or Application.

3. **Number of previous requests for adjournment or extension:** One, this is Plaintiffs' second request for an extension of time to file their Supplemental Brief;
4. **Whether these previous requests were granted or denied:** Plaintiffs' first request for an extension of time to file their supplemental brief was granted by Order dated June 29, 2023 (Dkt. 59);
5. **Whether opposing counsel consents:** All of the Defendants remaining in this Action are currently in default and thus Plaintiffs did not seek their consent.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

**EPSTEIN DRANGEL LLP**

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*Spin Master Toys UK Limited*

The request is granted. Plaintiffs shall file their supplemental brief by July 12, 2023. The Clerk of Court is respectfully directed to close the motion pending at Docket Number 60.

SO ORDERED.  
Date: July 5, 2023  
New York, New York

  
JOHN P. CRONAN  
United States District Judge